

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)	
)	
Lifeline and Link Up Reform and Modernization)	WC Docket No. 11-42
)	
Lifeline and Link Up)	WC Docket No. 03-109
)	
Federal-State Joint Board on Universal Service)	CC Docket No. 96-45
)	
Advancing Broadband Availability Through Digital Training)	WC Docket No. 12-23
)	

COMMENTS OF FRONTIER COMMUNICATIONS CORPORATION

Frontier Communications Corporation (“Frontier”) hereby submits the following comments in support of the United States Telecom Association *et al.*’s *Petition for Waiver and Clarification*.¹ Frontier joins the petitioning organizations’ support of the Federal Communications Commission’s (“Commission”) efforts and reforms adopted in the recent *Lifeline Order*.² However, Frontier also agrees with Petitioners that more time is necessary for postpaid providers, such as Frontier, to implement some of the *Order*’s reforms.

The *Petition* requests the Commission to postpone the effective date for the new flat-rate Lifeline support amount of \$9.25 from April 1, 2012, to October 1, 2012.³ The *Petition*

¹ The United States Telecom Association, The Independent Telephone and Telecommunications Alliance, The National Telecommunications Cooperative Association, The Organization for the Promotion and Advancement of Small Telecommunications Companies, The Western Telecommunications Alliance, and the Eastern Rural Telecom Association, *Petition for Waiver and Clarification*, WC Dkt. Nos. 11-42, 03-109, 12-23, CC Dkt. No. 96-45 (filed Mar. 9, 2012) (“*Petition*”).

² *In re: Lifeline and Link Up Reform and Modernization, Report and Order and Further Notice of Proposed Rulemaking*, WC Dkt. No. 11-42 *et al.*, FCC 12-11 (rel. Feb. 6, 2012) (“*Order*”).

³ *Petition* at 3-4.

identifies that such an extension is necessary because of the difficulties in meeting the tariff requirements associated with the new support amount and also the complexities of billing system integration. Frontier's experience demonstrates that good cause exists for waiver of the implementation deadline for the new flat-rate Lifeline support.

As the *Petition* describes, various states have different notice requirements before tariff changes become effective which stands as an impediment to timely filing.⁴ Frontier agrees with this assessment and notes that even though Frontier has been working to file tariff revisions since the *Order*'s publication in the Federal Register on March 2, 2012,⁵ it has been unable to clear the notice requirements to meet the Commission's April 1, 2012, effective date in many cases. Frontier operates in 27 states and, due to its structure, is changing 77 different tariffs to meet the Commission's new rules. Such widespread tariff revision is not easily accomplished due to the manpower involved in the revision process. Even when tariffs are filed they are often too late to meet the notice requirements. Approximately half (13) of Frontier's 27 states have 30 day notice requirements or more, which, as the *Petition* notes, has made compliance difficult as tariffs are being filed after the March 2 deadline. Thus good cause exists for waiver so that carriers can be compliant not just with federal law, but state law as well.

Frontier also agrees with the *Petition* that good cause for waiver exists due to the difficulties in implementing the appropriate rate changes in the billing system.⁶ The current system of Lifeline billing is complex, involving multiple tiers of discounts that can vary from state to state. Frontier supports the streamlined billing associated with the \$9.25 per line per month flat rate, but the complexities in the current billing system prevent an easy transition to the new system from a technical perspective. Converting the billing system will involve 128 different changes to

⁴ *Id.* at 5-6.

⁵ Lifeline and Link Up Reform and Modernization, 77 Fed. Reg. 12952 (Mar. 2, 2012).

⁶ *Petition* at 6.

rate elements, in addition to the changes required for Link Up. Additionally, Frontier does not run just one billing cycle on the first of the month; instead billing cycles are run daily which would necessitate pro-rated credits, another complication for the billing system. The combination of these factors leads to a complicated and time-consuming IT request.

Finally, on March 1, 2012, Frontier enacted a major systems conversion in nine of its states that it acquired from Verizon, switching the operating system from the former Verizon system to the legacy Frontier operating system. Such a massive conversion requires significant IT resource support for a number of months afterwards. When Frontier provided notice to the Commission in July 2011 that it intended to convert these systems,⁷ Frontier did not contemplate that rapidly-enacted Lifeline changes would also require immediate additional IT support. Accordingly it is difficult to ensure all of the billing system changes can be implemented in a timely manner. While this issue may be Frontier-specific, it demonstrates that there are many issues that carriers may have that could delay the implementation of the billing system changes within 30 days of Federal Register publication.

For the foregoing reasons Frontier believes good cause exists for waiver in implementing the \$9.25 per line charge and asks the Commission to grant the *Petition*.

⁷ Frontier Communications, Operational Support Systems Integration Plan, WC Dkt. No. 09-95 (filed July 29, 2011).

Respectfully submitted,

Frontier Communications Corporation

By:

/s/

Michael D. Saperstein, Jr.

Director of Federal Regulatory Affairs

Frontier Communications Corporation

2300 N St. NW, Suite 710

Washington, DC 20037

Telephone: (203) 614-4702

March 20, 2012